

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 1:25-CV-22324-WPD**

HARVEY JAMES GOMEZ FROMETA, an individual; FREDDY AMADO GOMEZ FROMETA, an individual; BELKIS PIERINA GOMEZ FROMETA, an individual; PIERINA ZULETA FROMETA, an individual; CAROLINA ZULETA FROMETA, an individual; LUIS ALEJANDRO ZULETA FROMETA, an individual; DINORAH MERCEDES FROMETA SENIOR, an individual; HAYDEE FROMETA BELLO, an individual; LUIS VICENTE FROMETA BELLO, an individual; LUIS MANUEL FROMETA PAREJA, an individual; BARBARA REGINA FROMETA GRILLO a.k.a. BARBARA REGINA FROMETA DE SIGISMONDI, an individual; TRINA MARGARITA FROMETA GRILLO, an individual; JOSE ANTONIO FROMETA GRILLO, an individual; ILEANA ALEJANDRINA FROMETA GRILLO, an individual; MAGDALENA FROMETA GRILLO, an individual,

Plaintiffs,

v.

ADRIAN FROMETA SUBERO, an individual; BILLO'S CARACAS BOYS LLC, a Florida limited liability company; TELMO PEREZ QUIROZ, an individual,

Defendants.

**DECLARATION OF SCOTT ALAN  
BURROUGHS**

I, Scott Alan Burroughs, hereby declare from my personal knowledge as follows. I represent the Plaintiffs in this action. I submit this declaration in support of Plaintiffs' Request for Judicial Notice filed at ECF No. 39. I am above eighteen (18) years of age and am competent to give the testimony set forth below. Said testimony is given from my own personal knowledge. If called as a witness, I could and would competently testify as set forth below.

1. Attached hereto as **Exhibit A** is a true and correct copy of a certified translation of the decree of the Supreme Court of Justice of the Bolivarian Republic of Venezuela. This is the same document that is filed on the record at ECF No. 34-2.
2. Attached hereto as **Exhibit B** is a true and correct copy of a certified translation of the Order of the Enforcement Court of Caracas. This is the same document that is filed on the record at ECF No. 34-3.
3. Attached hereto as **Exhibit C** is a true and correct copy of Defendants' trademark registration. This is the same document that is filed on the record at ECF No. 34-4.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 25, 2025, in New York, New York.

Dated: November 26, 2025

Respectfully submitted,

By: /s/ Scott Alan Burroughs  
Scott Alan Burroughs